

SOUTHERN District of TEXAS

HOUSTON DIVISION

In re Andrew Alexander, Jr.  
Rita R. Alexander,  
 Debtor

Case No. 10-38651-H4Chapter 13**Response to Notice of Final Cure Payment**Name of Creditor: WELLS FARGO BANK, N.A.Last four digits of any number you use to identify the debtor's account 0019Uniform Claim Identifier: n/aCourt Claim No. (if known): 6**Part 1: Status of Payments on Claim and Post-Petition Payments**

In response to the Trustee's Notice of Final Cure Payment, Creditor states that:

**Section A: Status of Claim Amounts (Choose ONE in Section A)**

- ☒ As of 11/23/2015, Debtor(s) has paid in full the amount required to cure the default on the Creditor's claim.
- ☐ The Creditor contends that Trustee disbursement(s) totaling \_\_\_\_\_ have not yet been posted to the account. With the application of those funds, the Debtor(s) will have paid in full the amount required to cure the default on the Creditor's claim.
- ☐ As of \_\_\_\_\_, Debtor(s) has not paid in full the amount required to cure the default on the Creditor's claim.
- ☐ The Creditor contends that the amounts itemized in Part 2 below remain unpaid.
- ☐ The Creditor contends that Trustee disbursement(s) totaling \_\_\_\_\_ have not yet been posted to the account. With the application of those funds, the Debtor(s) will have paid in full the amount required to cure the default on the Creditor's claim.

**Section B: Status of Post-Petition Payment, Fees, Expenses and Charges (Choose ONE in Section B)**☐ **Post-Petition Payments Paid by Debtor(s)**

- ☐ As of \_\_\_\_\_, the Creditor agrees that that Debtor(s) is current on all post-petition payments, fees, expenses and charges. Debtor(s) is due post petition for \_\_\_\_\_.
- ☐ As of \_\_\_\_\_, the Creditor disagrees that the Debtor(s) is current on all post-petition payments, fees, expenses and charges. The Creditor contends that the post-petition payments, fees, expenses and charges itemized in Part 3 below remain unpaid.

☒ **Post-Petition Payments Paid by Trustee**

- ☒ As of 11/23/2015, the Creditor agrees that the Debtor(s) is current with all post petition payments consistent with Section 1322(b)(5) including all fees, charges, expenses, escrow and costs. Debtor(s) is due post petition for 11/01/2015.
- ☐ The Creditor contends that Trustee disbursement(s) totaling \_\_\_\_\_ have not yet been posted to the account. With the application of those funds, the Debtor(s) will be current with all post petition payments through the date of the Trustee's Notice consistent with Section 1322(b)(5) including all fees, charges, expenses, escrow and costs.
- ☐ As of \_\_\_\_\_, the Creditor disagrees that the Debtor(s) is current on all post-petition payments, fees, expenses and/or charges consistent with Section 1322(b)(5). The Creditor contends that the post-petition payments, fees, expenses and charges itemized in Part 3 below remain unpaid.

**Part 2: Itemization of Claim Amounts not Cured by Debtor(s)**

Description	Amount
1. Late charges	(1) _____
2. Non-sufficient funds (NSF) fees	(2) _____
3. Attorney's fees	(3) _____
4. Filing fees and court costs	(4) _____

5. Advertisement costs (5) \_\_\_\_\_
6. Sheriff/auctioneer fees (6) \_\_\_\_\_
7. Title costs (7) \_\_\_\_\_
8. Recording fees (8) \_\_\_\_\_
9. Appraisal/broker's price opinion fees (9) \_\_\_\_\_
10. Property inspection fees (10) \_\_\_\_\_
11. Tax advances (non-escrow) (11) \_\_\_\_\_
12. Insurance advances (non-escrow) (12) \_\_\_\_\_
13. Property preservation expenses (13) \_\_\_\_\_
14. Escrow shortage or deficiency (not included as part of any installment payment listed in line item 15) (14) \_\_\_\_\_
15. Past Due Payments
- |               |       |                       |        |
|---------------|-------|-----------------------|--------|
| _____ - _____ | _____ | installments at _____ | \$0.00 |
| _____ - _____ | _____ | installments at _____ | \$0.00 |
| _____ - _____ | _____ | installments at _____ | \$0.00 |
- Past due payments prior to \_\_\_\_\_ in the total amount of \_\_\_\_\_  
See attached for breakdown.
- Total payments due ► (15) \$0.00
16. Other. Specify: (16) \_\_\_\_\_
17. Other. Specify: (17) \_\_\_\_\_
18. Unapplied Funds (18) (\_\_\_\_\_) \_\_\_\_\_
19. Total Claim Amounts not cured by Debtor(s). Add all of the amounts listed above. (19) \$0.00

**Part 3: Itemization of Post-Petition Payments, Fees, Expenses and Charges not Cured by Debtor(s)**

Description	Amount
1. Late charges	(1) _____
2. Non-sufficient funds (NSF) fees	(2) _____
3. Attorney's fees	(3) _____
4. Filing fees and court costs	(4) _____
5. Advertisement costs	(5) _____
6. Sheriff/auctioneer fees	(6) _____
7. Title costs	(7) _____
8. Recording fees	(8) _____
9. Appraisal/broker's price opinion fees	(9) _____
10. Property inspection fees	(10) _____
11. Tax advances (non-escrow)	(11) _____

## 13. Property preservation expenses

(13) \_\_\_\_\_

## 14. Past Due Payments

## Escrow advance on the account?

☐ No☐ Yes

Escrow advance balance on the account is \_\_\_\_\_ and will be collected through the escrow portion of the ongoing monthly installments.

_____ - _____	_____	installments at _____	\$0.00
_____ - _____	_____	installments at _____	\$0.00
_____ - _____	_____	installments at _____	\$0.00

Past due payments prior to \_\_\_\_\_ in the total amount of \_\_\_\_\_

See attached for breakdown.

## Total payments due ►

(14) \$0.00

## 15. Other. Specify:

(15) \_\_\_\_\_

## 16. Other. Specify:

(16) \_\_\_\_\_

## 17. Unapplied Funds

(17) (\_\_\_\_\_)

## 18. Total post-petition payments, fees, expenses and charges not cured by Debtor(s).

(18) \$0.00

Attorney for creditor (signature) /s/ ABBEY ULSH

Attorney for creditor (print) ABBEY ULSH

Bar registration number 24051459

Company BARRETT DAFFIN FRAPPIER TURNER &amp; ENGEL, LLP

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# UNITED STATES BANKRUPTCY COURT

## Certificate of Service

☒ I hereby certify that a copy of Response to Notice of Final Cure Payment was mailed first class, postage paid, this 24<sup>TH</sup> day of November, 2015 to:

Party 1:

DEBTORS:

RITA R. ALEXANDER

ANDREW ALEXANDER, JR.

5311 LELIA STREET

HOUSTON, TX 77026

Party 2:

☒ I hereby certify that a copy of Response to Notice of Final Cure Payment was uploaded through the Court's ECF System at the e-mail address register with the court on, this 24<sup>TH</sup> day of November, 2015 to:

Party 1

Debtor's Attorney:

VICKY M. FEALY

Email: [vfealy@fealylawfirm.com](mailto:vfealy@fealylawfirm.com)

TRUSTEE:

DAVID G. PEAKE

Email: [court@peakech13trustee.com](mailto:court@peakech13trustee.com)

Attorney for creditor (signature)  
/s/ ABBEY ULSH

Attorney for creditor (print) ABBEY ULSH